

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 20-10024-DPW
)	
)	
DANILO SOTO)	

MOTION TO MODIFY CONDITIONS OF RELEASE

Now comes the defendant in the above-named case and respectfully moves this Honorable Court to modify the conditions of his release so that he no longer has a curfew (he would remain on an active GPS device). The defendant was initially released without this condition, but it was modified because of a new arrest in state district court. That case has now been nol prossed by the Suffolk County District Attorney's Office.

The government defers to Probation as to this request and Probation defers to the Court.

The defendant further moves that should this Court deny the above requested modification, that his curfew for July 10, 2021, his birthday, be modified so that he can celebrate said date with his family until midnight.

The government doe not object to this request since the defendant will still be monitored by GPS.

Respectfully submitted,
By his attorney,

/s/ Robert Sheketoff
Robert Sheketoff
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CERTIFICATE OF SERVICE

I hereby certify that I am counsel for the defendant and have caused a copy of this pleading to be served electronically through the ECF system to all parties herein this 6th day of July, 2021.

/s/ Robert Sheketoff
Robert Sheketoff